

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION
Case No. 22-CV-68-BO

YOLANDA IRVING, individually and as the natural parent and guardian of JALEN IRVING, JUWAN HARRINGTON, CYDNEEA HARRINGTON, KENYA WALTON individually and as the natural parent and guardian of ROBERT WHITLEY, ZIYEL WHITLEY, DYAMOND WHITLEY, KAMISHA WHITLEY, and NANETTA GRANT as the natural parent and guardian of ZIQUIS GRANT, and EMANCIPATE NC, INC.

Plaintiffs,

vs.

THE CITY OF RALEIGH, Officer OMAR I. ABDULLAH, Sergeant WILLIAM ROLFE, Officer RISHAR PIERRE MONROE, Officer JULIEN DAVID RATTELADE, and Officer MEGHAN CAROLINE GAY, Officer DAVID MEAD, Officer JESUS ORTIZ, Officer KYLE PERRIN, Officer MICHEAL MOLLERE, Officer KYLE THOMPSON, Officer VINCENT DEBONIS, Officer DANIEL TWIDDY, Officer THOMAS WEBB, Officer DAVID MCDONALD, Officer DAVID GARNER, in their individual capacities, Chief of Police ESTELLA PATTERSON and City Manager MARCHELL ADAMS-DAVID, in their official capacities.

Defendants.

**PLAINTIFF EMANCIPATE NC'S NOTICE OF 30(B)(6)
DEPOSITION**

PLEASE TAKE NOTICE that pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, on January 5, 2023, at 10 AM, Plaintiff Emancipate NC, Inc, through its counsel, will take the oral deposition of the corporate representative of the Raleigh Police Department

concerning the topics listed on Exhibit A attached hereto. The deposition will take place at the offices of Tin Fulton Walker & Owen PLLC, 119 East Main Street, Durham, North Carolina, 27701. The deposition will continue until completed, for up to 7 hours, as provided in the Federal Rules of Civil Procedure. The deposition will be utilized for all purposes permitted under the Federal Rules of Civil Procedure, including, but not limited to, discovery, cross examination, and the preservation of testimony for use at trial. This deposition will go forward as noticed unless the parties mutually agree to hold the depositions on different dates or times and/or at different locations. These depositions will be taken by stenographic and video means before an officer authorized to administer oaths.

Dated: Durham, North Carolina
December 2, 2022

Respectfully,

/s/ Elizabeth Simpson
Elizabeth G. Simpson
N.C. Bar No. 41596

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CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon Counsel for Defendants via e-mail as follows:

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THIS the 2nd day of December 2022

Respectfully,

/s/Elizabeth G. Simpson

Exhibit A

1. Raleigh Police Department's (RPD) organizational structure
2. RPD's policies, practices, and procedures regarding the execution of search warrants on residences, including the reason for any changes in policies from January 1, 2015 to the present, as well as discussions within the department related to such policy changes, and any internal reviews or processes, or external recommendations or information, that informed the decision to make such changes
3. RPD's policies and procedures governing the SEU team's operations, from January 1, 2015 to present
4. RPD's history of disciplinary or corrective actions pertaining to SEU officers, from January 1, 2015 to present
5. RPD's policies, practices, and procedures regarding the use of "No Knock" warrants and "Knock and Announce" warrants from January 1, 2015, to present
6. RPD's decision to codify the banning of "No Knock" warrants in DOI 1110-08 in a policy with an effective date of May 17, 2022; the decision to post the new DOI 1110-08 policy to a public website; the decision to change the link of the Raleigh police directives; and decisions to communicate about DOI 1110-08 to the public
7. RPD leadership's understanding of the constitutional requirements pertaining to the execution of home search warrants
8. The basis for RPD's assertion to WRAL that the department's policy prohibiting no-knock raids was in effect prior to the incident involving the Plaintiffs